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11 | *Counsel for Respondent*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

14 MOHAMMAD AL FALABI,)
15 Petitioner,)
16 vs.)
17 UNITED STATES CITIZENSHIP AND)
IMMIGRATION SERVICES,)
18 Respondent.)
19)
Case No.: 2:16-cv-02921-JAD-VCF

**UNOPPOSED MOTION FOR AN
EXTENSION OF THE PRE-TRIAL
DEADLINES**

20 Respondent, by and through undersigned counsel, hereby submits this unopposed motion
21 for an extension of the pre-trial deadlines set in the Court's November 30, 2017 Order, ECF No.
22 19. On January 25, 2018, counsel for Respondent consulted, via e-mail message, with counsel
23 for Petitioner. Counsel for Petitioner indicated that she did not oppose this motion.

24 This is the second motion for an extension of time to complete discovery and to file
25 dispositive motions. Good cause exists for this extension. The parties had agreed to complete
26 the remaining discovery, the depositions of two U.S. Citizenship and Immigration Services
27 Immigration Services Officers, on January 25, 2018. However, at midnight on January 19, 2018,
28 the continuing resolution that had been funding the Department of Justice expired, and the

1 appropriations to the Department of Justice lapsed until January 23, 2018. Because Department
2 of Justice attorneys were prohibited from working during the lapse in appropriations, even on a
3 voluntary basis, except in very limited circumstances, including “emergencies involving the
4 safety of human life or the protection of property,” 31 U.S.C. § 1342, the counsel for Respondent
5 was unable to prepare for the depositions and had to cancel his travel.

6 Pursuant to the Court’s November 30, 2018 Order, ECF No. 19, the date to complete
7 depositions is January 31, 2018, to file dispositive motions is March 2, 2018, and to file a joint
8 pre-trial order is April 2, 2018 (or 30 days after decision on dispositive motions). ECF No. 19.
9 Respondent moves that the date to complete depositions be extended until February 2, 2018, to
10 file dispositive motions be extended to April 11, 2018, and to file a joint pre-trial order be
11 extended to May 11, 2018 (or 30 days after decision on dispositive motions).

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14 IT IS SO ORDERED:

15 
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: 1-26-2018

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2 Date: January 26, 2018

Respectfully submitted,

3 CHAD A. READLER
4 Acting Assistant Attorney General

5 WILLIAM C. PEACHEY
6 Director

7 EDWARD S. WHITE
8 Senior Litigation Counsel

9 /s/ Joseph F. Carilli, Jr.
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that a true and correct copy of the foregoing was served via the court's
3 electronic case filing system on January 26, 2018, to the counsel for the petitioner:

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